STIPULATION TO EXTEND CASE MANAGEMENT DATES

WHEREAS, the Court issued a Scheduling and Case Management Order on January 31, 2012 (Hon. Valerie Baker Fairbank, presiding);

WHEREAS, the Parties engaged in mediation before the Hon. Patricia Collins (ret.) on July 17, 2012 and are currently engaged in settlement discussions still involving Judge Collins;

WHEREAS the Parties wish to allow settlement discussions to continue without incurring unnecessary costs and without discovery deadlines expiring; and

WHEREAS, Penske and Prometheus have accordingly agreed that:

IT IS HEREBY STIPULATED and agreed to by and among the Parties that the case management dates be continued by approximately six months and revised as follows:

	Current Date	Revised Date
Fact discovery cut-off	Nov. 9, 2012	May 9, 2013
Initial expert disclosure	Dec. 9, 2012	June 7, 2013
Rebuttal expert disclosures	Jan. 9, 2013	July 9, 2013
Expert witness discovery	Feb. 9, 2013	Aug. 9, 2013
Settlement conference	May 17, 2013	Nov. 15, 2013
Motion cut-off	May 20, 2013	Nov. 20, 2013
Final pretrial conference	June 28, 2013 (1:30 pm)	Jan. 9, 2014 (1:30 pm)
Exhibit conference	July 12, 2013 (3:00 pm)	Jan. 24, 2014 (3:00 pm)
Jury trial	July 16, 2013 (9:00 am)	Jan. 28, 2014 (9:00 am)